

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

-versus-

DEANGELO MONTREL LAMONT SIMMONS
RAYNARD DEWAYNE WILLIAMS

) CRIMINAL NO. 2:24-670
) 21 U.S.C. § 841(a)(1)
) 21 U.S.C. § 841(b)(1)(A)
) 21 U.S.C. § 846
) 21 U.S.C. § 853
) 21 U.S.C. § 881
) 28 U.S.C. § 2461(c)
)
)
) **SEALED INDICTMENT**

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around July 25, 2024, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **DEANGELO MONTREL LAMONT SIMMONS** and **RAYNARD DEWAYNE WILLIAMS**, knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine, a Schedule II controlled substance;

- a. With respect to **DEANGELO MONTREL LAMONT SIMMONS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- b. With respect to **RAYNARD DEWAYNE WILLIAMS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

All in violation of Title 21, United States Code, Section 846.

FORFEITURE

DRUG OFFENSE:

Upon conviction for felony violation of Title 21, United States Code as charged in this Indictment, the Defendants, **DEANGELO MONTREL LAMONT SIMMONS** and **RAYNARD DEWAYNE WILLIAMS**, shall forfeit to the United States all of the Defendants' rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation of Title 21, United States Code.

PROPERTY:

Pursuant to Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offense charged in this Indictment includes, but is not limited to, the following:

A. Vehicle:

2020 Chevrolet Traverse LT
VIN: 1GNERGKW8LJ235094
Titled in the name of: Jasmine Symone Wright

B. Real Property:

- (1) 1522 Balsam Street
Charleston, South Carolina 29407
Parcel Number: 350-07-00-045
Titled in the names of: Anthony A. Coaxum and Brenda B. Coaxum
- (2) 701 Redbud Lane
Summerville, South Carolina 29486
Parcel Number: 195-02-03-272
Titled in the name of: MCH SFR Property Owner 1 LLC

C. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offense charged in the Indictment, and all interest and proceeds traceable thereto as a result of their violation of 21 U.S.C. §§ 841 and 846.

SUBSTITUTION OF ASSETS:

If any forfeited property being subject to forfeiture, as a result of any act or omission of a Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the forfeitable property.

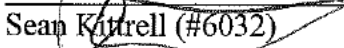
Pursuant to Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True BILL

FOREPERSON

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By:


Sean Kittrell (#6032)
Assistant United States Attorney
151 Meeting Street Suite 200
Charleston, South Carolina, 29401
Telephone: (843) 266-1668
Email Address: sean.kittrell@usdoj.gov